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Attorneys for Defendants Dennis Zember, Jr. and Primis Financial Corp.

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

LOTFI MEHDIAN and THE MEHDIAN
126 FAMILY TRUST,

Plaintiffs.

V.

DENNIS J. ZEMBER JR., an Individual;
PRIMIS FINANCIAL CORP., a Virginia
corporation d/b/a PRIMIS BANK; and
DOES 1-20, INCLUSIVE.

Defendants.

**DECLARATION OF KEVIN
HOOGSTRATEN IN SUPPORT OF
DEFENDANTS DENNIS J.
ZEMBER, JR. AND PRIMIS
FINANCIAL CORPORATION'S
NOTICE OF REMOVAL OF CIVIL
ACTION FROM STATE COURT**

1 I, Kevin Hoogstraten, hereby declare as follows:

2 1. I am an attorney at the law firm of Covington & Burling LLP, which
3 is counsel to Defendants Primis Financial Corporation (“Primis”) and Dennis J. Zember,
4 Jr. (“Zember”) (collectively, “Defendants”) in the above-captioned action.

5 2. I submit this declaration in support of Defendants’ Notice of Removal
6 of Civil Action From State Court. I have personal knowledge of the facts set forth in this
7 declaration and, if called upon as a witness, I could and would testify competently as to
8 those facts.

9 3. Attached as **Exhibit 1** is a true and correct copy of Plaintiffs Lotfi
10 Mehdian and the Mehdian 126 Family Trust (collectively, “Plaintiffs”) Complaint, filed
11 on December 19, 2023 in state court in the Superior Court of the State of California,
12 County of Los Angeles, docket number 23STCV30899 (the “State Court Action”).

13 4. Attached as **Exhibit 2** is a true and correct copy of the Summons filed
14 in the State Court Action and served by Plaintiffs.

15 5. Attached as **Exhibit 3** is a true and correct copy of the Notice of
16 Assignment filed in the State Court Action and served by Plaintiffs.

17 6. Attached as **Exhibit 4** is a true and correct copy of the Alternative
18 Dispute Resolution Information Packet filed in the State Court Action and served by
19 Plaintiffs.

20 7. Attached as **Exhibit 5** is a true and correct copy of the First Amended
21 General Order re Mandatory Electronic Filing filed in the State Court Action and served
22 by Plaintiffs.

23 8. Attached as **Exhibit 6** is a true and correct copy of the Voluntary
24 Efficient Litigation Stipulation Packet filed in the State Court Action and served by
25 Plaintiffs.

26 9. Attached as **Exhibit 7** is a true and correct copy of the Notice of Case
27 Management Conference filed in the State Court Action and served by Plaintiffs.

1 10. Attached as **Exhibit 8** is a true and correct copy of a Securities and
2 Exchange Commission (SEC) Form 4, Statement of Changes in Beneficial Ownership of
3 Securities, filed with the SEC and electronically signed by Zember dated December 15,
4 2022. The document can be found via searching the SEC's EDGAR database and is
5 publicly available at the following URL:

6 <http://edgar.secdatabase.com/1501/120919122061543/filing-main.htm>.

7 11. Attached as **Exhibit 9** is a true and correct copy of the Notice and
8 Acknowledgment of Receipt for Primis, executed on January 31, 2024 by myself on
9 behalf of Primis.

10 12. Attached as **Exhibit 10** is a true and correct copy of the Notice and
11 Acknowledgment of Receipt for Zember, executed on January 31, 2024 by myself on
12 behalf of Zember.

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19 I declare under penalty of perjury under the laws of California that the foregoing is
20 true and correct. Executed this 29th day of February, 2024 in Los Angeles, California.

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23 Kevin Hoogstraten
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